

INTELLECTULAW

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THERETO

June 25, 2014

VIA ECF

Hon. A. Kathleen Tomlinson  
United States Magistrate Judge  
100 Federal Plaza  
P.O Box 9014  
Central Islip, NY 11722-9014

Re: GENOMETRICA RESEARCH, INC.  
v. GORBOVITSKY, et al.  
Case No.: 11-CV-5802(ADS)(AKT)  
Our File No.: 7375-G

Your Honor:

We together with Blank Rome LLP and Hoffheimer Gartlis and Gross represent the Plaintiff Genometrica Research, Inc. (hereinafter "Genometrica") in the matter referenced herein above.

In accordance with your Honor's Individual Practice Rules, ¶ III (A)(2) and ¶ III (C)(1) we are writing to inform the Court that earlier today, Wednesday June 25, 2013, we served upon Defendants' counsel the following:

- a. Genometrica's Notice of Motion for Sanctions Against Defendants' Counsel and Defendant Dr. Vera Gorbovitski a/k/a Dr. Vera Gorfinkel;
- b. Declaration of Pangioti Betty Tufariello in Support of Genometrica Research Inc.'s Motion for Sanctions Against Defendants' Counsel and Defendant Dr. Vera Gorbovitski a/k/a Dr. Vera Gorfinkel together with its accompanying **Exhibits A-E**; and
- c. Genometrica Research Inc.'s Memorandum of Law in Support of its Motion for Sanctions Against Defendants' Counsel and Defendant Dr. Vera Gorbovitski a/k/a Dr. Vera Gorfinkel.

In conversations with Defendants' counsel regarding this Motion, they refused to provide us with the name of counsel, whom they allegedly retained for purposes of this Motion. Accordingly,

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the parties were unable to set their own briefing schedule to submit to the Court for approval, pursuant to ¶ III (C)(1)(b).

Therefore, pursuant to EDNY Local Civil Rule 6.1(b), we propose the following briefing schedule:

- Defendants' Opposition to Genometrica's Motion for Sanctions: Wednesday July 9, 2014; And
- Genometrica's Reply to Defendants' Opposition: Wednesday July 16, 2014.

We respectfully request that the Court so Order Genometrica' proposed briefing schedule and grant Genometrica such other relief , as the Court might deem just and proper.

Your Honor's patience, understanding and professional courtesies are greatly appreciated.

Respectfully submitted,

  
Panagiota Betty Tufariello

PBT: ao

cc Robert Kenney, Esq.  
Nicholas Malito, Esq.

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**CERTIFICATE OF SERVICE**

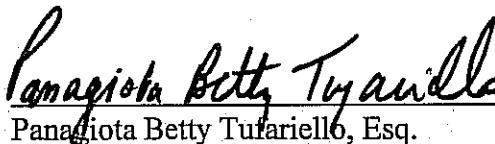
I hereby certify that a true and correct copy of the foregoing **JUNE 25, 2014, LETTER TO HON. TOMLINSON** has been filed via ECF, a notice of which will be sent by operation of the Court's electronic filing system to all parties, and has also been served to counsel for Defendants via Electronic Mail, addressed to:

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on June 25, 2014

  
Panagiota Betty Tufariello  
Panagiota Betty Tufariello, Esq.